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5 **IN THE UNITED STATES DISTRICT COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA

6 PHILIP K. CONLEY, an)	Case No. 05-02249 MJJ
7 individual;)	
8)	STIPULATION AND PROPOSED
Plaintiff,)	ORDER TO ALLOW PLAINTIFF TO
9 vs.)	FILE REPLY BRIEF 14 DAYS
)	BEFORE HEARING ON MOTION TO
)	REMAND
10 KEMPER INSURANCE COMPANIES, an)	
Illinois Corporation;)	Date of Hearing: 8-30-05
11 BROADSPIRE SERVICES, INC., a)	
Delaware Corporation, aka)	Time: 9:30 a.m.
12 Broadspire Management Services;)	
PLATINUM EQUITY LLC, a Delaware)	Courtroom: 11, 19th Floor
13 Limited Liability Company; DOES)	
1-100, inclusive,)	
14)	
Defendants.)	
15 _____)	

16
 17 It is hereby stipulated between the parties to this action,
 18 through their respective attorneys and subject to the Court's
 19 approval, that plaintiff's reply brief on his Motion to Remand
 20 Action to State Court, now set for hearing on August 30, 2005,
 21 may be filed 14 days before the continued date of the hearing.

22 The need for additional time for plaintiff's reply brief was
 23 occasioned by the inadvertent late filing by defendant Kemper
 24 Insurance Companies of the complete Kemper Severance Plan as
 25 Amended Exhibit A to the Affidavit of Eric Epperson.

26 Dated: August 3, 2005 LAW OFFICES OF PHYLLIS E. ANDELIN
 PHYLLIS E. ANDELIN P.C.

27
 28 s/_____
 Attorneys for Plaintiff

1 Dated: August 2, 2005

BOORNAZIAN, JENSEN & GARTHE

2
3 s/_____
Attorneys for Defendant Kemper
Companies

4 Dated: August 2, 2005

MUNGER TOLLES & OLSON LLP


5
6 s/_____
Attorneys for Defendants Broadspire
7 Services Inc., Platinum Equity LLC

8 I attest that the this Stipulation and Proposed Order was
9 signed by all parties to the stipulation.

10 By: s/_____
11 Phyllis E. Andelin

12 IT IS SO ORDERED.

13 Dated: August 10, 2005

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15 Honorable Martin J. Jenkins
16 United States District Judge
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